

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT DAYTON**

<b>PAYSOURCE, INC., et al.</b>	:	Case No. 3:07 CV 0129
Plaintiffs,	:	(Judge Walter Herbert Rice)
v.	:	
<b>MIRABILIS VENTURES, INC., et al.</b>	:	
Defendants.	:	

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**REPLY MEMORANDUM IN SUPPORT OF MOTION FOR  
EXTENSION TO ANSWER OR OTHERWISE RESPOND TO  
THE PLAINTIFFS' COMPLAINT [DOC. NO. 9]**

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The Moving Defendants, by and through counsel, have moved this Court for an extension of time to answer or otherwise respond to the Complaint filed against them due to the fact that the Defendants only recently engaged the undersigned counsel. Given the recent engagement, the number and location of Moving Defendants and the issues presented, a twenty day extension was requested so that counsel could adequately respond on behalf of the Moving Defendants. The issue of service of process raised by the Plaintiffs does not relate to the extension the undersigned has requested, which is being requested not for the purpose of delaying matters nor at a point in time when the Court's docket will be materially affected. The Moving Defendants respectfully reiterate their request for an extension through July 22, 2007.

Respectfully submitted,

/s/ Joseph C. Oehlers

David C. Greer, Trial Attorney (0009090)

E-mail: [dcg@bgllaw.com](mailto:dcg@bgllaw.com)

Joseph C. Oehlers (#0065740)

E-mail: [jco@bgllaw.com](mailto:jco@bgllaw.com)

Steven K. Dankof, Jr. (0080628)

E-mail: [skd@bgllaw.com](mailto:skd@bgllaw.com)

BIESER, GREER & LANDIS LLP

400 National City Center

6 N. Main Street

Dayton, OH 45402

(937) 223-3277

(937) 223-6339 (fax)

Attorneys For Defendants, Mirabilis Ventures, Inc.,  
Mirabilis HR, SPH, Inc., Common Pay Masters, Inc.,  
AEM, Inc., Aaron Bates, Yaniv Amar, Marty Flynn,  
James Sadrianna and Jay Stollenwerk

#### **CERTIFICATE OF SERVICE**

This is to certify that on the **11th** day of **July 2007**, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system and that a true and correct copy of the foregoing document was electronically mailed such filing to the attorneys of record or parties from whom counsel has not appeared:

*Attorneys for Plaintiffs:* Brian Scott Sullivan, Esq., Seth A. Schwartz, Esq.  
and Timothy S. Mangan, Esq.

*Attorney for Defendant Michael Stanley:* Scott K. Jones, Esq.

BIESER, GREER & LANDIS

/s/ Joseph C. Oehlers

Joseph C. Oehlers

And that on the **11th** day of **July, 2007**, a true and correct copy of the foregoing was sent, via regular U.S. Mail, postage prepaid, to the following unrepresented Defendants listed in the Plaintiffs' Complaint:

Frank Amodeo  
614 Lake Avenue  
Orlando, FL 32801

Avant Services, Inc.  
156 Shinnecock Hill  
Avondale, PA 19311

BIESER, GREER & LANDIS

/s/ Joseph C. Oehlers

Joseph C. Oehlers

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